

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WORLDWIDE DIRECTORIES, S.A. DE C.V.
and IDEAS INTERACTIVAS, S.A. DE C.V.,

Plaintiffs,

v.

No. 14 Civ. 07349 (AJN)

YAHOO! INC., YAHOO DE MEXICO, S.A.
DE C.V., BAKER & MCKENZIE and
BAKER & MCKENZIE, S.C.,

Defendants.

**DEFENDANTS YAHOO! INC. AND YAHOO DE MEXICO, S.A. DE C.V.'S NOTICE OF
MOTION TO DISMISS PLAINTIFFS WORLDWIDE DIRECTORIES, S.A. DE C.V.
AND IDEAS INTERACTIVAS, S.A. DE C.V.'s COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Shannon Mader, dated January 21, 2015; the accompanying Appendix of Unreported Foreign Legal Authorities, dated January 21, 2015; the accompanying Yahoo! Inc. and Yahoo de Mexico, S.A. de C.V.'s Memorandum of Law in Support of Their Motion to Dismiss Complaint, dated January 21, 2015, and all prior pleadings, papers, and proceedings had herein, Defendants Yahoo! Inc. and Yahoo de Mexico, S.A. de C.V. (collectively, "Defendants"), by their undersigned attorneys, Gibson, Dunn & Crutcher LLP, will move this Court, before the Honorable Alison J. Nathan, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a time and date to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint in its entirety for failure to state a claim, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), answering

papers, if any, are to be served on counsel for the Defendants within fourteen (14) days after the service of the moving papers, and reply papers, if any, are to be served within seven (7) days after the service of the answering papers.

Dated: New York, New York
January 21, 2015

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP

By: /s/ Theodore J. Boutrous Jr.
Theodore J. Boutrous, Jr. (*pro hac vice*)
Scott A. Edelman (*pro hac vice*)
Perlette Michèle Jura (*pro hac vice*)
Shannon Mader (*pro hac vice*)

333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: (213) 229-7000
Facsimile: (212) 229-7520

tboutrous@gibsondunn.com
sedelman@gibsondunn.com
pjura@gibsondunn.com
smader@gibsondunn.com

Lawrence J. Zweifach

200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

ljzweifach@gibsondunn.com

*Attorneys for Defendants Yahoo! Inc. and
Yahoo de Mexico, S.A. de C.V.*